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INTAKE

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Kavitha Babu (312) 353-1980

OCT 19 2018

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CASE NUMBER:

v.

UNDER SEAL

18CR

719

MAGISTRATE JUDGE WEISMAN

LUIS CONTRERAS,
also known as "Snoop"

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about February 18, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

*Code Section**Offense Description*

Title 18, United States Code, Section
922(g)(1)

Possession of ammunition by a convicted felon.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

FILED

OCT 19 2018

M. DAVID WEISMAN
MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT



DAVID A. LOPEZ

Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives (ATF)

Sworn to before me and signed in my presence.

Date: October 19, 2018



Judge's signature

City and state: Chicago, Illinois

M. DAVID WEISMAN, U.S. Magistrate Judge

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Ss

AFFIDAVIT

I, DAVID A. LOPEZ, being duly sworn, state as follows:

1. I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") and have been so employed since approximately October 2010. I am currently assigned to the Chicago Crime Gun Strike Force, and my responsibilities include investigating criminal violations relating to federal firearms and narcotics offenses committed by individuals and/or organizations engaged in violent activity.

2. This affidavit is submitted in support of a criminal complaint alleging that LUIS CONTRERAS, also known as "Snoop," has violated Title 18, United States Code, Section 922(g)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging CONTRERAS with possession of ammunition by a convicted felon, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, experience, training, information provided to me by other law enforcement agents and officers and the experience of those agents and officers, and review of law enforcement reports, video surveillance recordings, laboratory reports, and crime scene photographs.

4. Based on the information contained in this Affidavit, I respectfully submit there is probable cause to believe that on or about February 18, 2018, CONTRERAS, a convicted felon, possessed ammunition¹ that had been transported in interstate commerce, namely four Fiocchi .223 REM caliber cartridge cases, in violation of Title 18, United States Code, Section 922(g)(1).

FACTS IN SUPPORT OF PROBABLE CAUSE

A. Summary

5. As described in further detail below, CONTRERAS participated in the February 18, 2018 fatal shooting of Victim 1, a member of the Satan Disciples street gang at 77th Pl. and Kilbourn Ave. in Chicago. According to CPD records, and previous admissions by CONTRERAS, CONTRERAS is a member of the Latin Saints street gang, and based on federal and state law enforcement intelligence, the Latin Saints are based in the Back of the Yards neighborhood and are known to be a rival of the Satan Disciples.

6. In the early morning of February 18, 2018, at the time of the fatal shooting, surveillance video captured CONTRERAS standing on the southwest corner of 77th Pl. and Kilbourn Ave. and firing four shots in the direction of where the body of Victim 1 was found. Four fired Fiocchi .223 REM cartridge cases (the "Fiocchi Cartridge Cases") were recovered on the same corner. Near the Fiocchi Cartridge Cases, law enforcement officers recovered blood evidence that matched a

¹ Title 18, United States Code, Section 921(a)(17)(A) defines ammunition to be "ammunition or cartridge cases, primers, bullets, or propellant powder designed for use in any firearm."

DNA sample taken from CONTRERAS. CONTRERAS reported a gunshot wound to the thigh approximately 30 minutes after the shooting. When being treated by medical personnel, CONTRERAS was wearing clothing contaminated with gunshot residue.

B. The February 18, 2018 Murder of Victim 1

7. According to Chicago police reports, at approximately 5:30 a.m. on February 18, 2018, officers responded to a shots fired call in the area of 77th Pl. and Kilbourn Ave. on Chicago's southwest side. According to Chicago police, at approximately 5:20 a.m., a gunshot identification system, also referred to as "Shot Spotter," detected gunshots in or around that area. Upon arrival at the scene, according to police reports, police found Victim 1 laying in a driveway near a house on the 7700 block of S. Kilbourn Ave. with a gunshot wound to the back. Victim 1 was pronounced dead at the hospital a short while later. Police found a second victim, Victim 2, in a nearby house with a nonfatal gunshot wound. Victim 1 and Victim 2 are both identified as members of the Satan Disciples street gang, or SDs, in Chicago police databases. According to police reports and witness interviews, Victim 1 and Victim 2 had left the house on the 7700 block of S. Kilbourn Ave. and were getting into a vehicle when two men shot at Victim 1 and Victim 2.

C. Blood, Surveillance Video, and Other Evidence from the Scene

8. Footage from a private surveillance camera on the 7700 block of S. Kilbourn Ave. shows that, at about the same time as the fatal shooting, an individual with a light colored hoodie, dark jacket, and dark pants was limping northbound in

the middle of S. Kilbourn Ave., holding what appeared to be a rifle, towards 77th Pl. Upon reaching the crosswalk, the individual stopped, ducked, turned west, walked onto the sidewalk at the southwest corner of 77th Pl. and Kilbourn Ave., and turned facing southbound. The individual then appeared to fire four shots (based on the muzzle flash captured on the video) in the direction of the area where police later found Victim 1. At the same time that the individual fired the gunshots, a dark colored car drove northbound on S. Kilbourn Ave., turned left onto 77th Pl., and stopped. The individual with the firearm then got in the passenger side of the car before the car drove away from the scene.

9. Based on the crime scene photographs and Chicago Police reports, two spots of blood, marked as No. 66 and No. 67 in attached photograph at Exhibit A, were recovered from what appears to be recently fallen snow on the southwest corner of 77th Pl. and Kilbourn Ave. According to preliminary Illinois State Police forensic reports, the spot² of recovered blood marked No. 67 matched a previous DNA sample taken from CONTRERAS.

10. According to Chicago Police reports and the photographs, four fired FIOCCHI Cartridge Cases, marked Nos. 62, 63, 64, and 65 in the attached photograph at Exhibit B, were recovered on the same corner.³ As depicted in Exhibits A and B, the four fired FIOCCHI Cartridge Cases were recovered in close proximity to the recovered blood. The blood and the four fired FIOCCHI Cartridge Cases were recovered

² The other spot of blood marked No. 66 was not tested.

³ Based on my training and experience, cartridge cases can travel multiple feet from the location from where a firearm is fired.

in the same area where the surveillance footage captured the individual firing four shots. Based on the surveillance video, besides the individual firing the shots, no other person was in the area where the four cartridge cases and blood were recovered at the time of the shooting.

11. In addition to the four fired Fiocchi Cartridge Cases found on the corner of 77th Pl. and Kilbourn Ave., Chicago Police recovered multiple fired cartridge cases from near the driveway on the 7700 block of S. Kilbourn Ave. where Victim 1 was found by the police. The cartridge cases recovered from near the driveway included 5.56x45 mm and .223 REM cartridge cases. Based on my training and experience, 5.56x45 mm and .223 REM rounds can be fired out of an AR type pistol or rifle.

D. CONTRERAS Reported a Gunshot Wound Approximately 30 Minutes after the Victim 1 was Murdered

12. As described above, the fatal shooting of Victim 1 at 77th Pl. and Kilbourn Ave. took place at approximately 5:20 a.m. According to Google Maps, 77th Pl. and Kilbourn Ave. is an approximately 20 to 30 minute drive (about 7 to 8 miles driving distance) from the 4500 Block of S. Hermitage in the Back of the Yards neighborhood of Chicago. According to local and federal law enforcement intelligence, this is within the territory of the Latin Saints.

13. According to Chicago police reports, at approximately 5:47 a.m., Shot Spotter detected approximately 20 shots in the area of the 4500 Block of South Hermitage.

14. At approximately 5:47 a.m., according to Chicago Police Observation Devices or "POD" camera footage and police reports, a Nissan Sentra with snow

brushed off part of the windshield pulled over in front of a fire station at 4401 S. Ashland Ave., a few blocks away from 4500 S. Hermitage Ave.

15. At approximately 5:50 a.m., according to police reports, CONTRERAS entered the fire station at 4401 S. Ashland Ave. and reported a gunshot wound to the right thigh.

16. According to Chicago police personnel, CONTRERAS was transported to the hospital wearing a light gray hoodie, black jacket, and dark pants. As described above, this clothing appears to match the clothing worn by the individual limping with the firearm at 77th Pl. and Kilbourn Ave. in the surveillance video. Furthermore, according to Illinois State Police laboratory tests, gunshot residue was found on CONTRERAS' light gray hoodie and black jacket.

17. According to Chicago police reports, CONTRERAS claimed that he was walking on the 4500 Block of S. Hermitage when an unknown assailant in a ski mask emerged from a gangway with a rifle and shot at CONTRERAS.

18. According to Chicago police reports, officers went to the area of the 4500 block of S. Hermitage at approximately 6:00 a.m. and recovered approximately 12 fired cartridge cases. According to preliminary ballistics tests, the 5.56x45mm cartridge cases recovered on the 4500 block of S. Hermitage and some of the 5.56x45mm cartridge cases recovered from near the driveway where Victim 1 was found were fired from the same firearm.

19. Based on the video of the shooting, my knowledge of CONTRERAS' physical description, the shooter's apparent limp in the video, the gunshot wound to

CONTRERAS' leg, the blood found on the corner that preliminarily matched CONTRERAS' DNA, the proximity of the blood to the four FIOCCHI Cartridge Casings found on the corner, the fact that CONTRERAS was wearing the same type of clothing as the shooter in the video, and the gunshot residue found on CONTRERAS' clothing, I believe the individual firing the gun in the video is CONTRERAS.

E. Interstate Nexus

20. An ATF interstate nexus expert physically examined the four fired FIOCCHI Cartridge Cases recovered on the southwest corner of 77th Pl. and Kilbourn Ave. The ATF interstate nexus expert determined that none of the cartridge cases were manufactured in the state of Illinois and therefore, had traveled in interstate commerce.

F. CONTRERAS' Criminal History

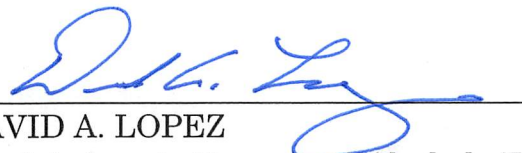
21. According to a review of records of certified convictions, CONTRERAS has been convicted of at least five crimes punishable by imprisonment for a term exceeding one year, including: (a) a October 2, 1998 conviction in the Circuit Court of Cook County for aggravated carry/possess firearm, for which defendant was sentenced to one year imprisonment; (b) a October 2, 1998 conviction in the Circuit Court of Cook County for unlawful use of firearm/felon, for which defendant was sentenced to two years imprisonment; (c) an April 30, 2002 conviction in the Circuit Court of Cook County for kidnapping/secretly confine for which defendant was sentenced to four years imprisonment; (d) a July 22, 2009 conviction in the Northern District of Illinois for conspiracy, dealing in firearms without a license, and being a

felon in possession, for which defendant was sentenced to one hundred months imprisonment, and (e) a October 20, 2009 conviction in the Circuit Court of Cook County aggravated battery w/firearm/person, for which defendant was sentenced to six years imprisonment.

CONCLUSION

22. Based on the foregoing, I respectfully submit there exists probable cause to believe that that on or about February 18, 2018, CONTRERAS, a convicted felon, knowingly possessed ammunition that had been transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

FURTHER AFFIANT SAYETH NOT.



DAVID A. LOPEZ
Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives

SUBSCRIBED AND SWORN to before me on October 19, 2018.



Hon. M. David Weisman
United States Magistrate Judge

EXHIBIT A

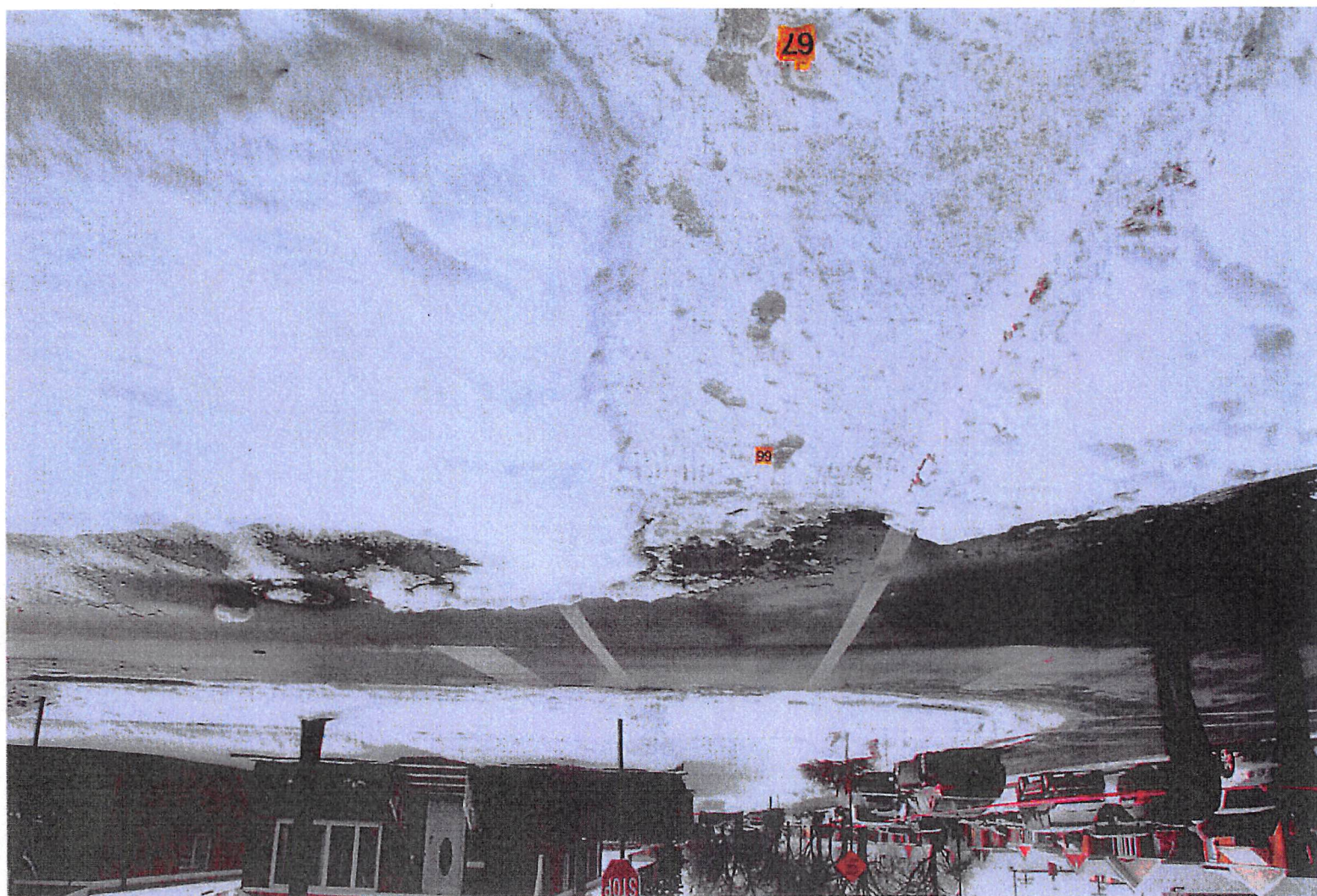


EXHIBIT B

